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SUMMARY OF EVIDENCE

This Exhibit provides a Rule 1006 summary of the some of the key evidence in the record relating to Coalition Plaintiffs' standing, including evidence filed with this Brief.

A. Plaintiffs Disadvantaged By Having to Vote by Mail

Many individual Coalition Plaintiffs and Coalition Members strongly prefer voting in person but have had to vote by mail to increase the likelihood that their votes are properly counted and have been disadvantaged by having to do so. By law, absentee ballots must be cast before Election Day, depriving mail voters of the benefit of having the most up-to-date information. Voting by mail also deprives Coalition Plaintiffs and Coalition Members of the ability to vote in person with their community. Coalition Members have also been disadvantaged when they did not receive their mail ballots in time to cast them before Election Day. Other have been disadvantaged by the expense and time required to securely submit their mail ballot. Coalition members, such as Nakamura, who planned to vote by mail were further burdened when their absentee ballots never arrived in the mail.

Source	Document Title
Doc. 327-1, at 37	Declaration of J. Smythe Duval (Member)
Doc. 327-1, at 40-41	Declaration of Laura Digges (Plaintiff)
Doc. 327-1, at 43-44	Declaration of William Digges III (Plaintiff)

Doc. 640-1, at 150, 153	Declaration of Megan Missett (Plaintiff)
Doc. 640-1, at 158	Declaration of Ricardo Davis (Plaintiff)
Doc. 640-1, at 163	Declaration of Laura Digges (Plaintiff)
Doc. 640-1, at 168	Declaration of William Digges III (Plaintiff)
Doc. 680-1, at 174	Declaration of Jeanne Dufort (Member)
Ex. C at ¶¶ 10, 15	Declaration of Jeanne Dufort (Member)
Ex. D at ¶ 5	Declaration of Rhonda Martin (Director)
Ex. E at ¶ 11	Declaration of Aileen Nakamura (Member)
Ex. F at ¶ 17	Declaration of Elizabeth Throop (Member)
Ex. G at ¶ 12	Declaration of B. Joy Wasson (Member)

B. Inability to Verify QR Codes on BMD Paper Ballots

Individual Coalition Plaintiffs and other Coalition Members have declared that their inability to verify their vote is correctly encoded in the QR portion of BMD ballot has kept them from voting in person, as they would prefer.

Source	Document Title
Doc. 640-1, at 150-151	Declaration of Megan Missett (Plaintiff)
Doc. 640-1, at 157	Declaration of Ricardo Davis (Plaintiff)
Doc. 640-1, at 163	Declaration of Laura Digges (Plaintiff)

Doc. 640-1, at 168	Declaration of William Digges III (Plaintiff)
Doc. 680-1, at 174	Declaration of Jeanne Dufort (Member)
Doc. 723, at 41	Declaration of Aileen Nakamura (Member)
Doc. 723, at 56	Declaration of Paschal McKibben (Member)
Ex. C at ¶ 14	Declaration of Jeanne Dufort (Member)
Ex. F at ¶ 13	Declaration of Elizabeth Throop (Member)

C. Difficulty Verifying “Human-Readable” Portion of Paper Ballot

Coalition Members have declared that the “human-readable” portion of the paper ballots produced by BMDs are also difficult or impossible to verify in practice. Dufort is unable to memorize her entire ballot and choices in order to effectively verify the ballot printed by the BMD. McKibben had difficulty reading the “human-readable” portion because the text is too small.

Source	Document Title
Doc. 680-1, at 174-175	Declaration of Jeanne Dufort (Member)
Doc. 723, at 56,	Declaration of Paschal McKibben (Member)
Ex. F at ¶¶ 12, 13	Declaration of Elizabeth Throop (Member)

D. Ballot Secrecy

Some Coalition members have risked voting in-person and some have observed the installed BMDs in polling places. They found that the BMDs' large and upright touchscreen made it difficult to vote privately and believe they were denied their right to cast a secret ballot.

Source	Document Title
Doc. 723, at 39-43	Declaration of Aileen Nakamura (Member)
Doc. 723, at 46-47	Declaration of Lucia Gambino (Member)
Doc. 723, at 51	Declaration of S. Kathryn Grant (Member)
Doc. 723, at 54-56, 58	Declaration of Paschal McKibben (Member)
Doc. 723, at 61	Declaration of Rhonda J. Martin (Director)
Doc. 723, at 72-74	Declaration of Priscilla Smith (Member)
Doc. 755, at 80-81	Declaration of B. Joy Wasson (Member)
Ex. C at ¶¶ 12, 13	Declaration of Jeanne Dufort (Member)
Ex. D at ¶¶ 6, 24	Declaration of Rhonda Martin (Director)
Ex. E at ¶ 25	Declaration of Aileen Nakamura (Member)
Ex. F at ¶ 19	Declaration of Elizabeth Throop (Member)

Plaintiffs and other Coalition members had to forego voting in person because of their concerns that the metadata created by the BMDs and scanners could be used to reveal who they voted for and violate their right to ballot secrecy.

Source	Document Title
Doc. 640-1, at 151	Declaration of Megan Missett (Plaintiff)
Doc. 640-1, at 159	Declaration of Ricardo Davis (Plaintiff)
Doc. 640-1, at 164-165	Declaration of Laura Digges (Plaintiff)
Doc. 640-1, at 169	Declaration of William Digges (Plaintiff)
Doc. 680-1, at 173	Declaration of Jeanne Dufort (Member)

E. PollPad Problems

Plaintiffs have had to forego voting in-person out of concern that the well-documented PollPad problems would keep them from being able to vote.

Source	Document Title
Doc. 640-1, at 150-151	Declaration of Megan Missett (Plaintiff)
Doc. 640-1, at 157	Declaration of Ricardo Davis (Plaintiff)
Doc. 640-1, at 163	Declaration of Laura Digges (Plaintiff)
Doc. 640-1, at 168	Declaration of William Digges (Plaintiff)
Ex. C at ¶ 11	Declaration of Jeanne Dufort (Member)
Ex. F at ¶ 17	Declaration of Elizabeth Throop (Member)

F. Machine Counts in Some Precincts Members' are Wrong

Source	Document Title
Ex. B at ¶ 29-30	Declaration of Marilyn Marks

G. Coalition Has Had to Divert Resources From Other Endeavors

Source	Document Title
Ex. B. at ¶ 3-13	Declaration of Marilyn Marks
Ex. C at ¶¶ 7, 8	Declaration of Jeanne Dufort (Member)
Ex. D at ¶ 25	Declaration of Rhonda Martin (Director)
Ex. E at ¶ 7	Declaration of Aileen Nakamura (Member)